

PRIVACY POLICY

1. INTRODUCTION

1.1. This Data and Privacy Policy ("**Policy**") establishes the guidelines of **GLINA GROUP LLC ("Glina")** regarding how we collect, process, and share the personal data of our service providers and/or personnel ("**Data Subjects**" or "**Data Subject**", as applicable), with reference to the Brazilian General Data Protection Law (Federal Law No. 13,709/2018, or simply the "**LGPD**"), and other applicable rules.

2. INFORMATION COLLECTED FROM DATA SUBJECTS

Where is the Data Subjects' data and information collected from?

1.1. Glina collects various information about Data Subjects, including information from: contracts.

2.1. Most of this information is provided directly by the Data Subject, whether in person, or by digital or physical means. Other information is generated in the course of our provision of services, or collected by Glina, in our systems and databases.

What types of data and information may Glina collect?

2.2. The data we collect about Data Subjects includes:

Full name, if applicable, of your representative, contact information (including telephone and e-mail), home address, marital status, professional occupation, date of birth, nationality.

Personal documents such as RG or RNE number, CPF, driver's license (CNH), and Work Card (Carteira de Trabalho), passport, banking details, spouse's data, as well as other personal documents, when applicable.

2.3. The fact that a given piece of personal data is listed above does not mean that we will necessarily collect it from the Data Subject. Some data will only be collected in specific situations and only if applicable to the Data Subject, in the context of their relationship with Glina.

2.4. Glina will only collect your personal data based on the legal bases provided for by the LGPD, such as, for example, your consent, our legitimate interest, and/or for the performance of contracts we have entered into with the Data Subject, and always for specific purposes.

2.5. In some cases, we will not be able to carry out certain activities if the Data Subject does not provide the information we request. In other cases, data processing will need to be carried out to comply with Glina's legal and/or regulatory obligations. In other situations, providing information will be necessary to enable performance of the contract we have entered into with the Data Subject, or to serve our legitimate interests, in the context of the business activities carried out by Glina. The Data Subject will be informed when the collection of personal data is optional.

3. USE OF YOUR INFORMATION

3.1. Generally speaking, we use Data Subjects' information for the following purposes:

3.1.1. Data collection is a method that provides a complete overview and an in-depth understanding of the company's results, as well as what can be improved or revised, which will serve as input for planning business strategies.

3.1.2. Organization, to separate them, and well-defined objectives to make it possible to separate what is necessary at that moment or in that context.

3.1.3. Carrying out your registration, identity confirmation, and sending notifications about our services.

3.2. We may also process your information when necessary to comply with our legal or regulatory obligations, for the regular exercise of our rights in judicial, administrative, or arbitration proceedings, and in other processing situations based on Glina's legitimate purposes, as well as in accordance with applicable rules.

3.3. We will always take appropriate measures to ensure that we keep your personal information secure, accurate, and up to date.

4. USE OF COOKIES

4.1. Glina may use *cookies* or other personal identification technologies to help personalize your browsing experience on the Website. *Cookies* are small text files stored in the memory of the computers of the Website's users, which make it possible to recognize various information about such users, such as the date, time, and frequency of visits, and browsing history, facilitating access and allowing global data to be compiled, which will enable improvements to the content. Cookies do not damage the Website users' computers or files.

4.2. Glina uses cookies for the purpose of offering specific and personalized content and services to Website users.

5. SHARING OF INFORMATION

With whom does Glina share Data Subjects' data and information?

5.1. In certain situations, Glina may share the Data Subject's personal data with third parties when reasonably necessary to fulfill the purposes set out in this Policy.

5.2. Contracts entered into by Glina include provisions on the protection of personal data and restrict such third parties from using personal data for any purpose other than those provided for in the contract or by law.

6. INTERNATIONAL DATA TRANSFER

Does Glina transfer Data Subjects' data and information abroad?

6.1. In some cases, in order to fulfill the purposes set out herein, Glina will need to transfer data abroad. In such cases, we will take all necessary and appropriate measures to ensure that the Data Subject's personal data is stored securely, all in accordance with the security requirements and standards established by the LGPD and other applicable rules.

7. RETENTION AND DELETION

For how long does Glina retain Data Subjects' data and information?

7.1. As a general principle, we do not retain Data Subjects' information (except in anonymized form) for longer than necessary, given the purposes for which such information was collected and processed. This means that we will generally retain information about the Data Subject only for the period necessary to fulfill the purposes described in this Policy.

7.2. Some information may be retained even after processing has ended, for the period necessary to comply with Glina's legal or regulatory obligations. At other times, we may keep the Data Subject's data and information when we have a legitimate interest in doing so, and/or for the protection and regular exercise of our rights in judicial, administrative, or arbitration proceedings.

7.3. If the Data Subject wants more information about the storage of their personal data and its retention period, please contact our DPO.

8. RIGHTS

What rights does the Data Subject have regarding the data and information under Glina's control?

8.1. Generally speaking, Data Subjects have the following rights regarding their data processed by Glina, upon request:

8.1.1. Confirmation of the existence of Processing: The right to know about the processing of their personal data by Glina and to verify whether such Processing is lawful.

8.1.2. Access: The right to request access to the Data Subject's personal data under Glina's control. We will take the necessary measures to verify whether Glina is processing the Data Subject's personal data, and we may occasionally request specific information to help us locate such data. Glina may, however, refuse to provide information and data to a Data Subject when disclosure of such information and data would reveal information about other persons; in such case, Glina will provide as much information as possible without disclosing information and data about other persons.

8.1.3. Correction of data: The right to request that Glina rectify the Data Subject's personal data, if such data is incomplete, inaccurate, or outdated.

8.1.4. Anonymization, blocking, or deletion of data: The right to request that Glina anonymize, block access to, or delete any unnecessary or excessive personal data, as well as any personal data processed in violation of the LGPD and other applicable rules.

8.1.5. Portability: The right to request the portability of the Data Subject's personal data to another service or product provider, subject to our trade and industrial secrets, and in accordance with the regulations of the National Data Protection Authority ("**ANPD**"). The right to data portability does not apply to any data that has already been anonymized by Glina.

8.1.6. Withdrawal of Consent: The right to freely withdraw the Data Subject's consent, at any time, through an express statement. Any processing carried out under previously given consent will remain valid.

8.1.7. Deletion of data processed based on Consent: The right to request the deletion of the Data Subject's personal data, within the scope and technical limits of the activities, when the Data Subject withdraws their consent and there is no other legal basis that permits the processing of the data. Glina may refuse such a request in certain cases, such as, for example, when processing is necessary for us to comply with other legal or regulatory obligations.

8.1.8. Right to information: The right to information about the public and private entities with which Glina has shared their personal data.

8.1.9. Right to the possibility of denying Consent: The right to information about the possibility of not giving consent to the processing of personal data, as well as about the consequences of refusal.

8.1.10. Objection: The right to object to processing carried out on the basis of one of the exceptions to the consent requirement, if there is non-compliance with the provisions of the LGPD and other applicable rules.

8.1.11. Complaint: The right to file petitions and complaints regarding the processing of the Data Subject's personal data. We encourage Data Subjects to approach Glina first to seek resolution of any complaint. Data Subjects also have the right to file petitions regarding their personal data directly with the ANPD, in accordance with applicable rules and within their limits.

8.2. If, for any reason, it is impossible for Glina to adopt the requested measure, Glina will inform the Data Subject of the factual and/or legal reasons preventing the adoption of the requested measure.

8.3. If the request is manifestly unfounded or excessive, Glina may refuse to comply with it. In such case, Glina will inform the Data Subject of the reasons for the refusal and will explain their right to file a complaint with a supervisory authority, as well as to seek judicial relief on the matter.

9. EXERCISE OF THE DATA SUBJECT'S RIGHTS

9.1. Any Data Subject or their legally appointed representatives may make a request relating to their own personal data when Glina processes their data in the capacity of Controller.

9.2. Requests must be made in writing and, preferably, by electronic means through the channel hr@glina.us.

9.3. Data Subjects will be asked to verify their identity and to provide some of their personal data necessary to handle their request, such as contact details, as well as information necessary to fulfill the request (for example, the data to be anonymized, corrected, or deleted, and their preferred outcome or resolution). Generally speaking, Data Subjects will need to provide:

9.3.1. Full name, CPF number, e-mail address of the Data Subject and, if applicable, of their representative;

9.3.2. Right they wish to exercise with Glina;

9.3.3. Date of the request and signature;

9.3.4. Any document that may demonstrate or justify the exercise of their right.

9.4. When a Data Subject appoints a legal representative, Glina may need to seek additional information to verify that this appointment was made appropriately before proceeding to handle the request.

9.5. For most requests, Glina will respond within 15 (fifteen) days of receipt or in accordance with the period specified in the LGPD. This does not include the time used to verify the details of a Data Subject or their legal representative, nor the time during which Glina awaits further information from the individual in order to handle their request.

10. SECURITY AND PRIVACY

10.1. Glina adopts technical and administrative security measures capable of protecting personal data against security incidents (including unauthorized access, modification, destruction, or disclosure).

10.2. To ensure security and adopt appropriate measures, Glina will take into account the storage method, implementation costs, and the nature, scope, context, and purpose of the processing of personal data, as well as the likelihood and severity of the risks to the Data Subject's rights and freedoms.

10.3. Data security means that Glina ensures:

10.3.1. Access restriction.

10.3.2. Pseudo-anonymization.

10.3.3. Encryption.

10.4. Personal Data under Glina's control will not be shared with third parties, unless such third parties have agreed to comply with certain data security procedures, or demonstrate to Glina the existence and fulfillment of other appropriate measures.

10.5. Should any security incident be discovered that may pose a relevant risk or harm to Data Subjects, Glina will report such fact, within a reasonable period, to the National Authority and to the affected Data Subjects.

10.6. However, Glina disclaims liability for the sole fault of third parties, such as in the case of an attack by hackers or crackers, or for the sole fault of the Data Subject, such as, for example, when the Data Subject themselves transfers or exposes their personal data to third parties.

11. UPDATES TO THIS POLICY

11.1. We reserve the right to review the content of this Policy from time to time, in particular to adapt it to new legal and regulatory requirements and technical developments, so that we may also safeguard the protection of personal data in the future.

11.2. This version of this Policy was last updated on 07/20/2025

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